

## **REMARKS**

### **Introduction**

Claims 1-22 are now pending in the application. Reconsideration as to the patentability of the claimed subject matter is respectfully requested in view of the following discussion.

### **35 U.S.C. § 103 Rejections**

Claims 1-6, 8-10, 13-15, 17-19 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bhagwat et al. (U.S. Patent No. 6,563,517) in view of Katayama (U.S. Patent No. 7,098,914). Applicant respectfully traverse this rejection.

Bhagwat does not teach and every element of the claims as the Examiner has acknowledged in this and previous Office Actions. The Examiner states that Katayama teaches “a user can input code that indicates the image’s position for placement...therefore, code sufficiently qualifies as a textual reference since it is text that refers to the image and its properties and location.” Katayama teaches stitching an image back together when a panoramic picture is taken. See Figure 19. For example, when one takes three pictures of a mountain range, Katayama teaches a method for analyzing picture boundaries and parameters in physical space (i.e. adjoining images) so that a larger “synthesized” composite image is created (as if one panoramic picture was taken).

Katayama does not teach “searching said web page document for sequences of textual references to images that are directly adjoining; when said web page document includes more than one textual references to images that are directly adjoining, rendering each of the images represented by said textual references that are directly adjoining so as to generate a composite image, said textual references comprising conceptual linking in a common formatted object to signify directly adjoining images” as claimed. The instant specification provides:

The web page document is searched for runs of images. The term “run of images” as used in the present Application includes **textual references** to images **that are directly adjoining**, and textual references to images that are conceptually linked by virtue of being included in a common formatting object (e.g., a table of a frame). In the present embodiment, whenever a formatting object includes multiple textual references to images, all of the images with the formatting object comprise a run of images (irrespective of whether the textual references to the images are directly adjoining in a visual sense). Thus, whenever a HTML table includes multiple textual references to images, all of the images within the HTML table comprise a run of images. Similarly, when a HTML

frame includes multiple textual references to images, all of the images within the HTML frame comprise a run of images. (p. 18, lines 4-15) (emphasis added).

The present invention as claimed is directed towards identifying textual references that are adjoining, so as to generate a composite image represented by the textual references for display. The phrase “textual references to images that are directly adjoining” should be read as: (i) textual references to images; (ii) [the textual references] are directly adjoining. The images represented by the textual references are somewhat irrelevant. Placement of the images with respect to one another (if any of the images are indeed related) is already determined by the underlying coding. For example, images to be displayed in an HTML table are images conceptually linked by virtue of being in a table (i.e. a common formatting object); however, these images may or may not be related (unlike in Katayama wherein each image is an image which physically must be placed next to another image to “see” the complete final image). In other words, the images of the present invention as claimed may not be pieces of a larger image, but images independent of one another. For example, in an HTML application, the underlying code may appear like the code in Figure 9 or Figure 10 of the instant specification. “Run of images” refers to the fact that the HTML code contains a number of “<img src=images...>” tags that are in a row, that is, they appear in the code sequentially, one after the other (i.e. textual references that are directly adjoining). These “runs of images” are identified and processed according to the claims.

In supporting this 103 rejection, the Examiner states in part “[i]t would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the teachings of Bhagwat et al with Katayama et al for the purpose of transcoding and **conceptually linking directly-adjoining images** from a webpage...because this allows for the transcoding of an entire images segments...” (emphasis added).

Based on this statement, the Applicant respectfully submits the claim elements have been incorrectly interpreted. As discussed above, textual references are the elements that are directly adjoining, not the images. There is no limitation or requirement that the images to which the textual references refer to are in any way related to each other pictorially or in the same “image segment.” In some instances, the images referred to may not even be displayed at the same time (e.g., in the case of a “mouseover” in which one image is replaced or supplement by another when the user places the mouse pointer over the original image). Combining Katayama with

Bhagwat makes Bhagawat inoperable, or at best, adds nothing. As such, combining Katayama with Bhagwat does not cure Bhagwat's deficiencies. Accordingly, the Applicant respectfully requests this rejection be withdrawn and submits that the claims are in condition for allowance.

Claims 11, and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bhagwat in view of Katayama and further in view of to Hawkins (U.S. Patent Application Publication No. 2001/0032254). Applicant respectfully traverses this rejection. As discussed above, Katayama does not cure the deficiencies of Bhagwat. As such, the combination of Hawkins cannot cure Katayama's deficiencies. Accordingly, the Applicant respectfully requests this rejection be withdrawn and submits that the claims are in condition for allowance.

Claims 7, 12, 16, and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bhagwat in view of Katayama and further in view of Robotham et al (U.S. Patent No. 6,704,024). Applicant respectfully traverses this rejection. As discussed above, Katayama does not cure the deficiencies of Bhagwat. As such, the combination of Robotham cannot cure Katayama's deficiencies. Accordingly, the Applicant respectfully requests this rejection be withdrawn and submits that the claims are in condition for allowance.

## **Conclusion**

Applicant submits the claims are in condition for allowance and respectfully request that the Examiner reconsider the outstanding rejections. The Examiner is invited to telephone the undersigned representative if an interview might expedite allowance of this application.

Respectfully submitted,

BERRY & ASSOCIATES P.C.

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By: /Shawn Diedrich/  
Shawn Diedrich  
Registration No. 58,176  
Phone: 480.704.4615

## Correspondence Address

**Cust. No. 49637**

Berry & Associates, P.C.  
9255 Sunset Boulevard, Suite 810  
Los Angeles, CA 90069  
Phone: (310) 247-2860  
Fax: (310) 247-2864